

John J. E. Markham, II (CA Bar No. 69623)

Email: [jmarkham@markhamread.com](mailto:jmarkham@markhamread.com)

Elizabeth L. Read (CA Bar No. 87618)

Email: [eread@markhamread.com](mailto:eread@markhamread.com)

MARKHAM & READ

One Commercial Wharf West

Boston, Massachusetts 02110

Tel: (617) 523-6329

Fax: (617) 742-8604

Attorneys for Plaintiffs BRUCE CAHILL, GREG CULLEN,  
SHANE SCOTT, RON FRANCO, and PHARMA PAK, INC.

IN THE UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA  
SOUTHERN DIVISION

BRUCE CAHILL, an individual, et al.,	)	<b>CASE NO: 8:16-cv-00686-AG-DFM</b>
	)	
Plaintiffs,	)	<b>PLAINTIFFS' AND</b>
	)	<b>COUNTERCLAIM DEFENDANTS'</b>
-- vs. --	)	<b>NOTICE OF MOTION AND</b>
	)	<b>MOTION TO DISMISS</b>
PAUL PEJMAN EDALAT, an	)	<b>DEFENDANT PAUL EDALAT'S</b>
individual, et al.,	)	<b>SECOND AMENDED COUNTER-</b>
	)	<b>CLAIM (DOCKET NO. 92)</b>
Defendants.	)	
	)	<b>Date: November 28, 2016</b>
	)	<b>Time: 10:00 a.m.</b>
	)	<b>Place: Courtroom 10D</b>
	)	<b>Honorable Andrew J. Guilford</b>
AND RELATED CROSS-	)	<b>United States Courthouse</b>
CLAIMS/COUNTERCLAIMS.	)	<b>411 West Fourth Street</b>
	)	<b>Santa Ana, CA 92701-4516</b>

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PLAINTIFFS' AND COUNTERCLAIM DEFENDANTS' NOTICE OF MOTION AND MOTION TO  
DISMISS DEFENDANT PAUL EDALAT'S SECOND AMENDED COUNTERCLAIM (DOCKET  
NO. 92)

**CASE NO: 8:16-cv-00686-AG-DFM**

1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 Please take notice that on November 28, 2016, at 10:00 a.m., or as soon  
3 thereafter as counsel may be heard in Courtroom 10D of the United States District  
4 Court, located at 411 West Fourth Street, Santa Ana, California 92701-4516,  
5 Plaintiffs/Counterclaim Defendants Bruce Cahill, Gregory Cullen, Shane Scott,  
6 Ron Franco, and Pharma Pak, Inc. joined by Counterclaim Defendants Brent  
7 Cahill, Leslie Harold Wood, Ludwig Weimann, Mark John Erfurt, Erton Ayerdol,  
8 Kira Lindsay Cahill, Karen Jane Grobba-Cahill, Life Tech Global LLC, Kira  
9 Investments LLC, Cahill Family Trust, and Cahill Bruce E Trust, will and hereby  
10 do move this Court to dismiss Defendant Paul Edalat's "Second Amended Counter-  
11 Claim and Cross-Complaint for Damages" (at Docket No. 92).

12 This motion is based on Rule 12(b)(6) of the Federal Rules of Civil  
13 Procedure, on this Notice of Motion and Motion, the accompanying Memorandum  
14 of Points and Authorities, the record in this case, and such further evidence and  
15 argument as may be presented at any hearing on this motion.

16 This motion is made following the conference of counsel pursuant to L.R. 7-  
17 3 which took place during conferences on October 17 and on October 24, 2016  
18 during which opposing counsel discussed this matter and could not resolve it.

19 Dated: October 24, 2016

20 Respectfully submitted,

21 1

22 PLAINTIFFS' AND COUNTERCLAIM DEFENDANTS' NOTICE OF MOTION AND MOTION TO  
23 DISMISS DEFENDANT PAUL EDALAT'S SECOND AMENDED COUNTERCLAIM (DOCKET  
24 NO. 92)

25 CASE NO: 8:16-cv-00686-AG-DFM

MARKHAM & READ

By: /s/ John J. E. Markham, II  
John J. E. Markham, II  
*Attorney for Plaintiffs and  
Counterclaim Defendants*

**CERTIFICATE OF SERVICE**

Commonwealth of Massachusetts ) ss,  
County of Suffolk. )

I am employed in the county and state aforesaid. I am over the age of 18 and not a party to the within action. My business address is One Commercial Wharf West, Boston MA 02110

On October 24, 2016, I served the foregoing document described as:

**PLAINTIFFS' NOTICE OF MOTION AND MOTION TO DISMISS  
DEFENDANT PAUL EDALAT'S SECOND AMENDED COUNTERCLAIM  
(DOCKET NO. 92)**

**[X] BY ELECTRONIC MAIL via the ECF filing system on:**

Larry Rothman, Esq.  
Larry Rothman and Associates  
City Plaza  
One City Boulevard West Suite 850  
Orange, CA 92868  
714-363-0220  
Fax: 714-363-0229  
Email: tocollect@aol.com

Lee H Durst, Esq.  
The Durst Firm  
220 Newport Center Drive, Suite 11285  
Newport Beach, CA 92660  
949-400-5068  
Fax: 714-242-2096  
Email: lee.durst@gmail.com

*Attorneys for Defendants Paul Pejman Edalat, Olivia Karpinski, Farah Barghi, Sentar Pharmaceuticals, Inc., Blue Torch Ventures, Inc., LIWA, N.A., Inc., and*

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PLAINTIFFS' AND COUNTERCLAIM DEFENDANTS' NOTICE OF MOTION AND MOTION TO DISMISS DEFENDANT PAUL EDALAT'S SECOND AMENDED COUNTERCLAIM (DOCKET NO. 92)

**CASE NO: 8:16-cv-00686-AG-DFM**

1 *Sentus Land Management, LLC*

2 Executed on October 24, 2016, in Boston, Massachusetts.

3  
4 I declare under penalty of perjury under the laws of United States and the State of  
5 California that the foregoing is true and correct.

6  
7 /s/ John J. E. Markham, II  
8 John J. E. Markham, II